

## REMARKS

Applicant respectfully requests reconsideration of the present U.S. Patent application. Claims 1-27 stand rejected under 35 U.S.C. § 103. Claims 1, 10, and 19 have been amended. No claims have been canceled or added. Therefore, by this amendment, claims 1-27 remain pending.

### Drawing Objections

The drawings were objected to because Fig. 3 included the reference sign "Core logic controller 320" that is not mentioned in the description. The specification has been amended to add the reference sign "Core logic controller 320" to the description. Applicant therefore respectfully requests that the Examiner withdraw the drawing objection.

### Claim Rejections - 35 U.S.C. § 103

#### Rejection of claims 1, 2, 4-11, 13-20 and 22-27 based on *Pecone*

Claims 1, 2, 4-11, 13-20 and 22-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,604,871 issued to Pecone (*Pecone*). For at least the reasons set forth below, Applicant submits that claims 1, 2, 4-11, 13-20 and 22-27 are not rendered obvious by *Pecone*.

Amended claim 1 recites the following:

a riser card coupled with the motherboard, the riser card having a circuit thereon that interacts with a corresponding portion of the chipset to provide a functionality to the system, the riser card also having a memory to store one or more indications of the functionality, wherein the riser card operates as a logical extension of the motherboard and provides an external interface for the motherboard; ...

Claim 10 is an apparatus claim that recites similar limitations. Claim 19 is directed to memory, and recites similar limitations. A proper rejection under 35 U.S.C. § 103 requires that a prior art reference, or references when combined, must teach or suggest all of the claim limitations of the rejected claim. See MPEP § 2143.

*Pecone* discloses a riser card enclosed within a computer system, which plugs into a set of connectors on the computer system's motherboard. See Fig. 3; Fig. 4; Fig. 6; Fig. 10; col. 2, lines 49-64; col. 4, lines 54-57; col. 6, lines 5-40. The riser card contains connectors into which a peripheral interface card can be plugged. See Fig. 5; Fig. 7; col. 3, lines 1-3; col. 4, lines 59-64. Thus, rather than plugging directly into the motherboard, a peripheral interface card plugs into the riser card, which acts as an intermediate connection that translates signals between the motherboard and the peripheral interface card. See col. 4, line 66 – col. 5, line 2; col. 5, lines 17-23. Accordingly, *Pecone* does not disclose a riser card that operates as a logical extension of a motherboard and provides an external interface for the motherboard. As a result, *Pecone* fails to teach or suggest all the limitations of claims 1, 10 and 19. Consequently, claims 1, 10 and 19 are not rendered obvious by *Pecone* for at least the reasons set forth above. Applicant therefore respectfully requests that the Examiner withdraw the rejection of claims 1, 10 and 19 under 35 U.S.C. § 103.

Applicant agrees with Examiner's assertion that *Pecone* fails to disclose a sequence of instructions to cause a driver to be loaded based, at least in part, on one or more indications of functionality, which is disclosed in claims 1, 10 and 19. See Office Action, page 3, para. 8, lines 14-15. However, Examiner asserts that it would have been obvious to modify *Pecone* to include a driver, because the driver would load the required

code to make the claimed system functional. See Office Action, page 3, para. 8, line 15 – page 4, line 3.

Applicant has considered Examiner's "Response to Arguments." See Office Action, pages 9-10. Applicant does not concede that it would be obvious to include a driver in *Pecone*. However, Applicant contends that assuming for the sake of argument that it would be obvious to include a driver in *Pecone*, merely including a driver does not necessarily lead to including a sequence of instructions to cause a driver to be loaded based, at least in part, on one or more indications of functionality.

Claims 2 and 4-9 depend from claim 1. Claims 11 and 13-18 depend from claim 10. Claims 20 and 22-27 depend from claim 19. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 2, 4-9, 11, 13-18, 20 and 22-27 are not rendered obvious by *Pecone* for at least the reasons set forth above.

Rejection of claims 3, 12 and 21 based on *Pecone* in view of *IBM Technical Bulletin*

Claims 3, 12 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Pecone*, in view of IBM technical disclosure *Enhanced Riser Card with Expansion Function Capability for Personal Computer*, Technical Disclosure Bulletin, July 1994 (*IBM*). For at least the reasons set forth below, Applicant submits that claims 3, 12 and 21 are not rendered obvious by *Pecone* in view of *IBM Technical Bulletin*.

As explained above, *Pecone* fails to disclose a riser card that operates as a logical extension of a motherboard and provides an external interface for the motherboard, as disclosed in claims 1, 10 and 19. *IBM* discloses a riser card that provides an

interconnection between adapter cards and a planar board (defined as a large printed circuit board). See page 2, lines 20-21. The riser card includes basic input/output software (BIOS) extension circuitry that consists of a socket to hold various types of memory. See page 2, lines 21-24. *IBM* does not disclose a riser card that operates as a logical extension of a motherboard and provides an external interface for the motherboard. Consequently, *IBM* fails to cure the deficiencies of *Pecone* described above, meaning that even if *IBM* discloses the features asserted by the Examiner, the combination of *Pecone* and *IBM* still fails to teach or suggest all of the limitations of claims 1, 10 and 19.

Claim 3 depends from claim 1. Claim 12 depends from claim 10. Claim 21 depends from claim 19. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 3, 12 and 21 are not rendered obvious by *Pecone* in view of *IBM* for at least the reasons set forth above.

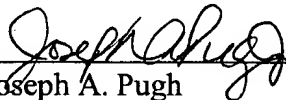
#### CONCLUSION

For at least the foregoing reasons, Applicant submits that the rejections have been overcome. Therefore, claims 1-27 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account  
number 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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